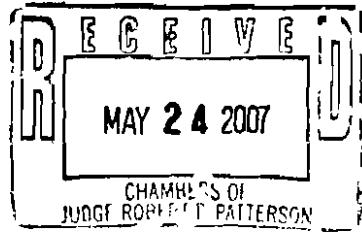


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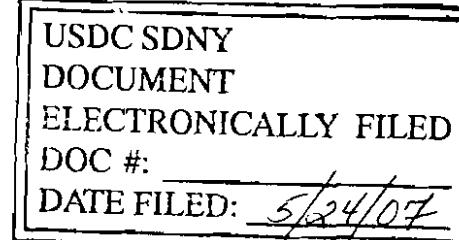
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BYRON KING CALLAN
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MEMO ENDORSED

BY HAND

Honorable Robert P. Patterson
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2550
New York, New York 10007



Re: 06 CV 13439, 07 CV 1357, 07 CV 2562,
07 CV 3104, 07 CV 3180
Our file 8923/PMK

Dear Judge Patterson:

At the last pretrial conference, you set June 1 as the last day to make motions in regard to forum. Defendant Yang Ming intends to be filing motions in regard to each of the above cases. Yang Ming's bill of lading contains a compulsory English jurisdiction clause. At the present time, we have been instructed by our clients on 5 cases involving the EASLINE TIANJIN for the voyage in question. However, we have been advised that there are numerous other claims that may be brought in the Southern District of New York and which would naturally be consolidated before Your Honor. Rather than submitting piecemeal motions which could tie up the court, we would request that the court extend the deadline to make the motions until the end of July when the time bar will expire and all claims will have been filed and consolidated before Your Honor.

At the present time, we are still obtaining documentation in regard to the 5 claims that have been sent to us. There are multiple other claims for which complaints have yet to be filed involving defendant Yang Ming. We believe that the extension of the time to file the forum motions would be in the interest of justice since it would not only allow one single motion to be filed by Yang Ming and other carriers, but would also allow the parties to informally discuss settlement possibilities during this period.

*Applications Granted
motions may be filed by July 31, 2007.
Someday
5/24/07 Robert P. Patterson vsn v*

Honorable Robert P. Patterson

May 23, 2007

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We have contacted several of plaintiff's counsel but have not been able to contact all in regard to these claims. The counsels for three of the claims are not opposed to an adjournment of the June 1 motion date.

Because June 1 is next Friday, we respectfully request that the undersigned be advised as soon as possible whether the adjournment has been granted in the event that motions on some of the cases will have to be filed.

No prior adjournments have been granted or requested.

The court's assistance in this matter is most appreciated.

Very truly yours,

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR

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PMK/am

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